

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

CHICAGO TRUCK DRIVERS, HELPERS AND)
WAREHOUSE UNION (INDEPENDENT))
PENSION FUND, a Trust, and JACK STEWART,)
its Fund Manager and one of its Trustees,)

Plaintiffs,

v.

LLA CONSTRUCTION HOLDING, INC., an)
Illinois Corporation f/k/a ALL Construction Co.,)
Inc. and a/k/a A.L.L. Construction Co., Inc.)

Defendant.

Case No. 08 C 3954
Judge Darrah
Magistrate Judge Denlow

NOTICE OF MOTION

TO: See attached Certificate of Service.

PLEASE TAKE NOTICE that on Thursday, August 28, 2008, at the hour of 9:00 a.m., I shall appear before the Honorable John W. Darrah, United States District Court Judge for the Northern District of Illinois, Eastern Division, 219 South Dearborn Street, Room 1203, Chicago, Illinois 60604, and then and there present **Plaintiffs' Motion for Default and Default Judgment**, a copy of which is hereby served upon you.

Respectfully submitted,

/s/ Thomas J. Angell
Thomas J. Angell
Attorney for Plaintiffs

Jacobs Burns Orlove Stanton & Hernandez
122 S. Michigan Avenue, Suite 1720
Chicago, IL 60603
312) 372-1646

CERTIFICATE OF SERVICE

I, Thomas J. Angell, an attorney, certify that I caused a copy of the attached **Notice of Motion** to be served upon the following individuals on August 22, 2008:

Via Overnight Delivery to:

LLA Construction Holding, Inc.
c/o Alex Puig
1430 N. Elston Avenue
Chicago, IL 60622

Via First Class Mail to:

LLA Construction Holding, Inc.
c/o Alexander Puig
1902 Ivy Lane
Glenview, IL 60026-1069

/s/ Thomas J. Angell